

## **BAYAT LAW FIRM**

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March 11, 2020

Robert Stewart  
Liability Advisor  
OMES  
PO Box 53364  
Oklahoma City OK 73152

Re: RM Claim #: 2020026987  
Claimant: Laurie Garland

Dear Mr. Stewart:

I apologize for just now responding to your December 27, 2019 letter, offering to resolve the claim at hand. I am delighted that the State has instituted processes by which we are able to discuss the validity of this claim and amicably attempt to resolve it in good faith. This case particularly would be important to resolve privately so as not to re-traumatize my client, a victim of sexual assault, with a civil court case open to the public and to avoid the media's involvement if possible. Please let me know when we may be able to arrange a settlement discussion and perhaps consider a mediation if our conversations are fruitful.

My client has identified a tort claim against the Department of Corrections for negligence proximately resulting in my client being repeatedly sexually harassed and violated by Christopher RedEagle, deputy warden. As you know, the Muskogee County DA's office believes my client, and has commenced felony proceedings against RedEagle for sexual battery and bringing contraband into a correctional facility, supporting proof of what has transpired. That court has identified my client as a victim. I am attaching both the OSCN docket sheet regarding the case, as well as a courtesy copy of the criminal information, corroborating the proof that my client was harmed. We are set to be at an upcoming hearing with my client, the victim, at the request of the DA.

Aside from the sexual assaults, RedEagle used his position of control and demanded, inter alia, that my client wear underwear for a week that he provided her from outside the jail, so he could keep it and "sniff" it. We understand that he has corroborated having done so.

Also in good faith I am attaching photos of some love letters, highly inappropriate communications between Deputy Warden RedEagle and my client, again corroborating inappropriate activity proximately making my client a victim of harm. RedEagle would put a different name on such letters, in an apparent attempt to perhaps hide the activity.

The fact that RedEagle was able to accomplish the extent of harm to my client, including sexual assault and other harassment, indicates that the Department of Corrections needs to reconsider its policies and procedures and oversight activities. In fact, this particular situation should be used to help the DOC craft protocols and oversight activity that would protect other inmates and enhance the integrity of our penal system.

#### RECOMMENDATIONS FOR RESOLUTION

I have been reading about the large numbers of rapes by prison guards at DOC over the past decade and wanted to "think outside the box" with you. I recommend that we meet to discuss and agree upon a financial offer within the Oklahoma Governmental Tort Claim limit within our ninety days since my initial letter, in light of the criminal matter having been filed (attached).

Secondly, I recommend that the DOC consider working with my client to understand the details of the inappropriate activity, and empower her by letting her help the DOC craft protocols to protect other women, by her giving details of what happened. Such a resolution would not only be efficient, but it would also be a step toward improving a system that could and should be free of sexual battery. It might also help my client heal, knowing that she could be protecting other women.

I appreciate your professional courtesy,

M. Eric Bayat, Esq.  
For the Firm



IN THE DISTRICT COURT OF THE FIFTEENTH JUDICIAL DISTRICT OF THE STATE OF  
OKLAHOMA SITTING IN AND FOR MUSKOGEE COUNTY

THE STATE OF OKLAHOMA,  
Plaintiff,

vs.

Case No. CF-2018-857

CHRISTOPHER C. REDEAGLE  
ADDR: Pawhuska, OK 74056  
SSN: \*\*\*-\*\*-3982  
DOB: July, 1965  
Defendant(s).

INFORMATION

FOR:

COUNT 1: SEXUAL BATTERY - 21 O.S. § 1123(B), a FELONY  
COUNT 2: BRINGING CONTRABAND (WEAPONS / EXPLOSIVES / DRUGS / INTOXICATING  
BEVERAGE / LOW POINT BEER / MONEY) INTO JAIL / PENAL INSTITUTION - 57 O.S. §  
21(A), a FELONY

STATE OF OKLAHOMA, COUNTY OF MUSKOGEE:

I, Orvil Loge, the undersigned District Attorney of said County, in the name and by the authority of the State of Oklahoma, give information that in said County of Muskogee and in the State of Oklahoma, CHRISTOPHER C. REDEAGLE did then and there unlawfully, willfully, knowingly and wrongfully commit the crime(s) of:

COUNT 1: SEXUAL BATTERY - a FELONY, on or between the 19th day of February, 2019 and the 22nd day of February, 2019, by intentionally engaging in nonconsensual sexual activity with an inmate at Eddie Warrior Correctional Center, to wit: by kissing her, placing his hands inside her underwear and touching her buttocks while having her touch his penis through his clothes, in a lewd and lascivious manner and without the consent of Laurie Garland.

COUNT 2: BRINGING CONTRABAND (WEAPONS / EXPLOSIVES / DRUGS / INTOXICATING BEVERAGE / LOW POINT BEER / MONEY) INTO JAIL / PENAL INSTITUTION - a FELONY, on or between the 19th day of February, 2019 and the 22nd day of February, 2019, by possessing at Eddie Warrior Correctional Center, which is a penal institution, an item of contraband, specifically 2 firearms, without authority to do so.

ORVIL LOGE  
DISTRICT ATTORNEY

By

  
Morgan Muzilajovich  
Assistant District Attorney

I have examined the facts in this case and recommend that a warrant do issue.

By

  
Morgan Muzilajovich  
Assistant District Attorney

STATE OF OKLAHOMA  
COUNTY OF MUSKOGEE  
JUL 17 PM 4:05  
JAIL STATION  
COURT CLERK



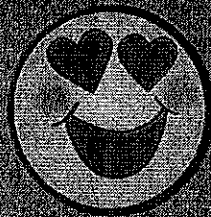
**WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA**

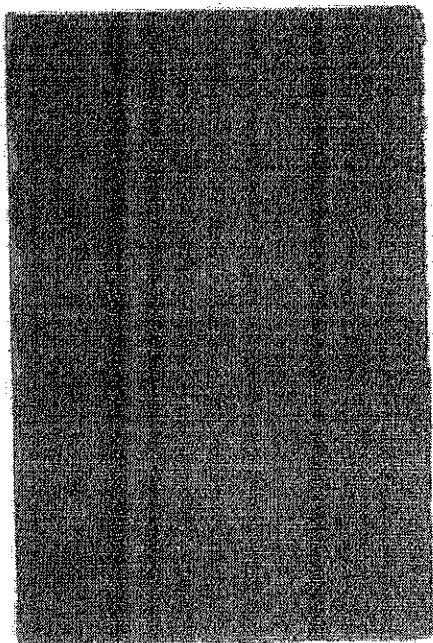
Johnny Blevins, ODOC - FUGITIVE APPREHENSION & INVESTIGATIONS, 440 S. Houston, Ste 605, Tulsa, OK 74127  
Randy Knight, ODOC - FUGITIVE APPREHENSION & INVESTIGATIONS, 440 S. Houston, Ste 605, Tulsa, OK 74127  
Casey Box, E.W.C.C., 400 Oak Street, Taft, OK 74463  
Bryan Cox, E.W.C.C., 400 Oak Street, Taft, OK 74463  
Laurie Garland, 2417 Sandy Creek Road, Ardmore, OK 73401  
Rebekah White, E.W.C.C., 400 Oak Street, Taft, OK 74463  
Julia Woolsey, EWCC, P.O. Box 315, Taft, OK 74463

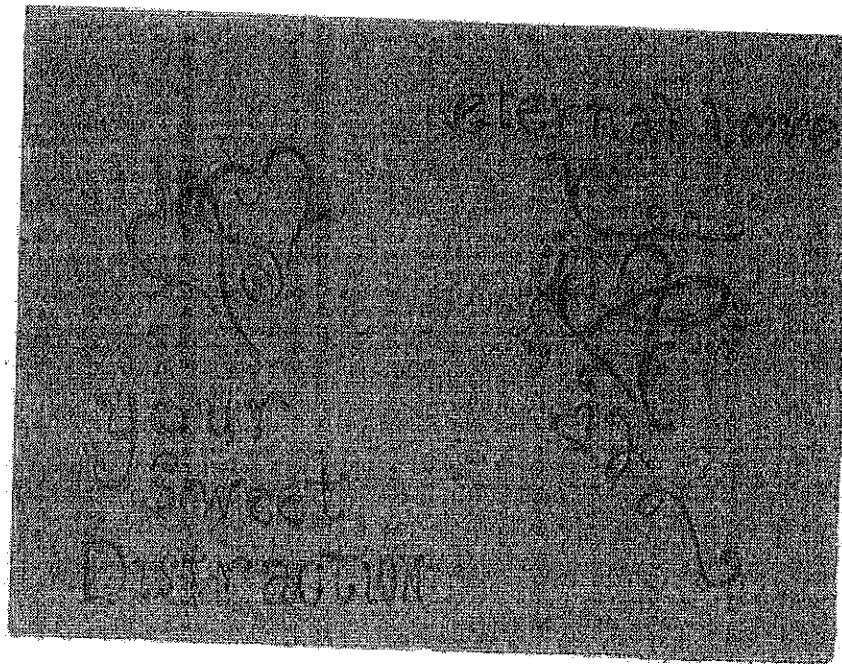




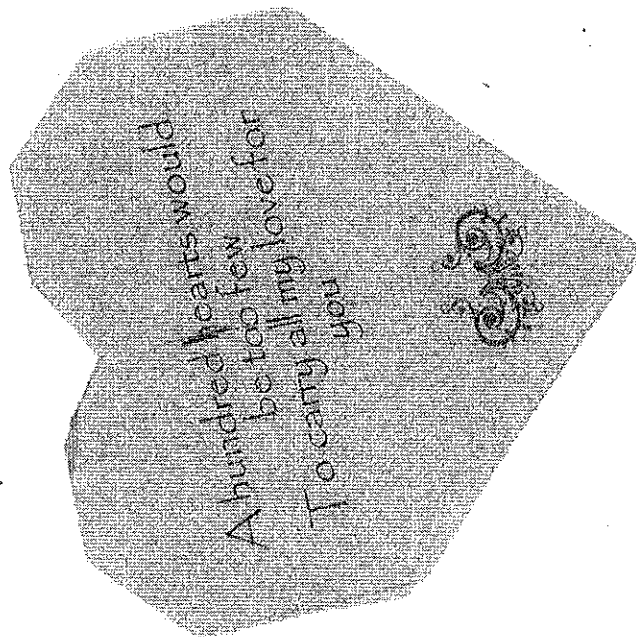












Inside Reads...  
"When we are apart,  
You always in my heart"



Laurie,

I hope this letter finds you well. I have so many things to say but don't even know where to start. I don't know when I will be able to visit you but I know it will be at least a week before I can do so. I know our visits are causing you some anxiety and that is the last thing in the world I want. I have thought about reducing my visits and contact, but am afraid that you will read into that as me pulling away from you and that is the last thing I would do. Tell me what you want, because I'm truly here to do what's best for you.

I miss you when we are apart and hope that you come home soon. The last time we talked you gave me some advice and that raised some questions I have for you. Do you not think that you are special, special to me? Do you think that I'm out just looking for anyone...will be looking for the next woman at some point? I appreciate your advice but it just provided some insight into your thinking. I hope that you don't believe me to be that shallow. I would like to think that you took a chance on me because we have something special.

I can still smell you in the clothes that you had left at my house, and I smell them when I'm lonely and thinking of you. I just wanted you to know that.

I can go on forever but I have to take care of the dogs and put the kids to bed. So I want to close with, I think of you constantly and feel a special bond with you. It tugs at my heart that we are apart, but I will always be here for you. Even once you get out if you don't come home I will still always be here for you.

Take care my love and my sweetheart.

Yours Truly,

Luke